

DOCKET FILE COPY ORIGINAL
Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
MAR 23 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Truth-in-Billing
and
Billing Format

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CC Docket No. 98-171

**Supplement to March 21, 2000
Petition for Temporary, Limited Waiver**

The Petitioning Local Exchange Companies ("Petitioners") that filed a Petition for Temporary, Limited Waiver on March 21, 2000 in the above-captioned proceeding ("Petition"), by counsel, hereby file this Supplement to include seven (7) additional companies in the Petition, Chicamauga Telephone Corporation, Diamond Telephone Services, Inc., Fulton Telephone Company, Gulf Pines Communications, LLC, Mound Bayou Telephone and Communications, Inc., Home Telephone Company, Inc., and Pine Belt Telephone Company, Inc. (the "Companies").¹ Like the Petitioners, the Companies hereby seek temporary, limited waiver of the Truth-in-Billing ("TIB") requirements, set forth in 47 C.F.R. § 64.2400, established by the Federal Communications Commission ("Commission" or "FCC") in its First Report and Order and Further Notice of Proposed Rulemaking in the above-captioned matter.² As indicated in the

¹ Attachment B hereto are the declarations of each of the Companies joining this Supplement, along with a revised copy of "Attachment A" which adds the names of the Companies to the list of Petitioners originally included in the Petition. The declarations contain facsimile signatures. The original signed declarations will be filed with the Commission upon receipt by counsel.

² In the Matter of Truth-in-Billing and Billing Format, First Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 98-170, FCC 99-72, released May 11, 1999, 64 Fed. Reg. 34488 (June 25, 1999) ("TIB Order"); Errata, CC Docket No. 98-170, DA 99-2092, released October 6, 1999.

No. of Copies rec'd _____
List A B C D E

attachments, the Companies seek temporary, limited waiver of various TIB rules that are effective April 1, 2000.

The factual circumstances confronting each of the Companies is substantially similar to that confronting each of the Petitioners, as stated in the Petition. Moreover, the policy bases and remedial measures that each Company will take during the time that the requested waivers are in effect are the same. Accordingly, this Supplement is filed in order to add the Companies to the list of Petitioners, without unnecessarily burdening the record with pleadings that duplicate the Petition. In the event the Commission deems it necessary, however, the Companies will file separate waiver requests.

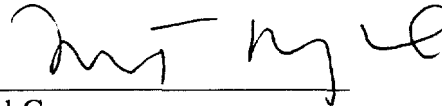
For the reasons stated in the Petition and the attachments, compliance with the April 1, 2000 effective date for certain of the TIB rules is technically and economically infeasible due to circumstances beyond the Companies' control, despite their reasonable efforts. Accordingly, the Companies, like the Petitioners, respectfully submit that a grant of this request for the time periods specified in the attachments will ensure that the Companies can implement the Commission's TIB directives in an efficient manner while avoiding unnecessary and wasteful expense. At the same time, and for the same reasons stated in the Petition, the consumer goals of these TIB rules will not be frustrated by a grant of this request in light of the conditions that each Company has agreed should be part of the relief.

Accordingly, in the event that action on the pending United States Telecom Association Petition does not grant the extent of the relief requested herein, the Companies request a waiver of the applicable TIB rules for the time periods specified in Attachment B.

Respectfully submitted,

Chicamauga Telephone Corporation
Diamond Telephone Services, Inc.
Fulton Telephone Company
Gulf Pines Communications, LLC
Mound Bayou Telephone and Communications, Inc.
Home Telephone Company, Inc.
Pine Belt Telephone Company, Inc.

By



David Cosson
Thomas J. Moorman
Margaret Nyland

Attachment A
Attachment B

Kraskin, Lesse & Cosson, LLP
2120 L Street, NW, Suite 520
Washington, DC 20037
202-296-8890

Their Attorneys

March 23, 2000

Attachment A
List of Petitioning Local Exchange Companies

Armstrong Telephone Company - Maryland
Armstrong Telephone Company - New York
Armstrong Telephone Company - North
Armstrong Telephone Company - Northern Division
Armstrong Telephone Company - Pennsylvania
Armstrong Telephone Company - West Virginia
Colorado Valley Telephone Cooperative, Inc.
Chicamauga Telephone Corporation
Diamond Telephone Services, Inc.
Fulton Telephone Company
Gulf Pines Communications, LLC
Mound Bayou Telephone and Communications, Inc.
Deerfield Farmers' Telephone Company
DeKalb Telephone Cooperative, Inc. dba DTC Communications
Germantown Telephone Company
Home Telephone Company, Inc.
North Pittsburgh Telephone Company
Pine Belt Telephone Company, Inc.
Poka Lambro Telephone Cooperative, Inc.
Poka Lambro Telecommunications, Inc.
 dba Poka Lambro Telephone Company
Valley Telephone Cooperative, Inc.
Copper Valley Telephone, Inc.

Attachment B

**CHICAMAUGA TELEPHONE CORPORATION
DIAMOND TELEPHONE SERVICES, INC.
FULTON TELEPHONE COMPANY
GULF PINES COMMUNICATIONS, LLC
MOUND BAYOU TELEPHONE AND COMMUNICATIONS, INC.**

Chicamauga Telephone Corporation ("Chicamauga"), Diamond Telephone Services, Inc. ("Diamond"), Fulton Telephone Company ("Fulton"), Gulf Pines Communications, LLC ("Gulf Pines"), and Mound Bayou Telephone and Communications, Inc. ("Mound Bayou") ("Petitioners") provide exchange and exchange access services in the States of Georgia and Mississippi. Specifically, Chicamauga provides exchange and exchange access service to approximately 6,591 lines in Georgia. Diamond and Gulf Pines provide exchange and exchange access service to approximately 114 lines and 364 lines in Mississippi, respectively. Fulton and Mound Bayou also provide exchange and exchange access service to approximately 9,009 lines and 1,028 lines in Mississippi, respectively. Chicamauga, Fulton and Mound Bayou members of the United States Telecom Association and are rural telephone companies under the Communications Act of 1934, as amended. The Petitioners provide billing and collection services to third party providers including such services for certain interexchange carriers' 1+ traffic. Chicamauga, Fulton and Mound Bayou also provide billing and collection services to providers of casual calling and alternate operator services.

Petitioners are currently in the midst of an end user billing system conversion utilizing the software developed by APTIS. Petitioners first discussed the conversion of their end user billing system with APTIS in early December, 1999. In this discussion, Petitioners stressed the need for compliance with the Commission's Truth in Billing ("TIB") rules, and were informed by APTIS that TIB compliance would not be an issue. Accordingly, based on this discussion, Petitioners fully anticipated that the new end user billing software would be fully TIB compliant by April 1, 2000. Moreover, Petitioners proceeded with the billing system conversion with the understanding that the necessary software and support would be provided sufficiently in advance of April 1, 2000, in order to allow Petitioners to finalize their conversion process and issue TIB compliant end user bills.

In mid-January, 2000, the physical conversion process began with the transfer of Petitioners' various end user databases from their existing software vendor, and the update of that information to comply with the requirements of APTIS's billing system software. As a result of unanticipated delays and the magnitude of the coordination activities required for the conversion of all of Petitioners' end user bills, APTIS only recently informed Petitioners (see attached) that the software included in the conversion would not be compliant with the TIB Requirements in advance of April 1, 2000 to allow sufficient testing of the new end user billing system prior to the issuance of the first billing cycle after April 1. Petitioners recognized that their existing end user billing system vendor could possibly render a TIB-compliant end user bill after Petitioner's new billing system is utilized for the billing cycle beginning April 25, 2000. However, Petitioners estimate that continuing to utilize their existing vendor would result in an additional expense of approximately \$17,000.00 for the billing cycles beginning at the end of April and approximately \$35,000 to \$37,000 for the billing cycle beginning at the end of May. Petitioners submit that such an approach would be economically wasteful.

Despite these efforts, it was not until a letter dated March 9, 2000, that APTIS indicated that it would not be able to meet the April 1, 2000 date, and it was not until March 13, 2000 that APTIS provided the necessary information that enabled Petitioners to assess what TIB compliance issues remained. Despite the Petitioners' reasonable, good-faith efforts, the delays in providing the necessary software upgrades and, in turn, the inability to conduct the proper testing were beyond Petitioners' control.

Based on the information that APTIS has provided to date, Chicamauga, Fulton and Mound Bayou request the following waivers for the time periods noted.

<u>TIB Rule Requirement</u>	<u>Rule Provision(s)</u>	<u>Requested Extension</u>
TIB New Service Provider Requirement	47.C.F.R. §64.2401(a)(2)	July 1, 2000
TIB Deniable/Nondeniable Requirement	47.C.F.R. §64.2401(c)	July 1, 2000
TIB Service Provider Name and Inquiry Contact Requirement	47 C.F.R. §64.2401(a)(1)-(2) and 47 C.F.R. §64.2401(d)	July 1, 2000

In addition, based on the information that APTIS has provided to date, Diamond and Gulf Pines seek the following waiver for the time periods noted.

<u>TIB Rule Requirement</u>	<u>Rule Provision(s)</u>	<u>Requested Extension</u>
TIB New Service Provider Requirement	47.C.F.R. §64.2401(a)(2)	July 1, 2000
TIB Deniable/Nondeniable Requirement	47.C.F.R. §64.2401(c)	July 1, 2000

Until the requested waiver expires, the Petitioners will provide the appropriate bill message and/or insert and the customer service responses identified in the Petition.

DECLARATION OF ERIC E. LINDSTROM, JR.

I, Eric E. Lindstrom, Jr., Chief Financial Officer of Fail Telecommunications Corporation, parent company of Chicamauga Telephone Corporation, Diamond Telephone Services, Inc., Fulton Telephone Company, Gulf Pines Communications, LLC, and Mound Bayou Telephone and Communications, Inc. (collectively the "Petitioners"), do hereby declare



March 9, 2000

Fail Communications
Bill Cooley
12 3rd Street
PO Box 922
Bay Springs, MS 39422

To all Aptis Clients

Software development at Aptis is in the process of developing our solution to satisfy the Truth in Billing requirements put out by the FCC. At this time we do not feel that we will be able to deliver that solution to all of our clients in time for the April 1 deadline. Therefore Aptis is strongly urging all of its clients to file for an extension with the FCC by March 15. We will contact you in the near future to go over our interpretation and implementation of the FCC requirements with you. If there are any immediate questions regarding this please feel free to contact me at 518-431-7518.

Sincerely,

A handwritten signature in cursive script that reads "Craig Engle/mm".

Craig Engle
Business Unit Director

San Antonio Office:
7411 John Smith Drive
Suite 200
San Antonio, TX 78229
P 210.949.4700
F 210.949.7100

Albany Office:
8 Southwoods Blvd
Albany, NY 12211
P 518.431.7500
F 518.427.1642

Glendale Office:
116 North Maryland Ave
Lower Level
Glendale, CA 91206
P 818.543.1881
F 818.543.1411

HOME TELEPHONE COMPANY, INC.

Home Telephone Company, Inc. ("Petitioner") provides exchange and exchange access services to approximately 22,031 access lines in South Carolina. The Petitioner is a member of the United States Telecom Association and is a rural telephone company under the Communications Act of 1934, as amended. The Petitioner provides billing and collection services for third party providers including such services for certain interexchange carriers' 1+ traffic and for providers of casual calling and alternate operator services. The Petitioner utilizes Associated Data Services ("ADS") for the provision of end user billing software. Petitioner has made frequent periodic contacts with its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements and has made reasonable and good-faith efforts to ensure that ADS would be taking all necessary steps to ensure that the software upgrades, modifications, or conversions to its end user billing system would be made in sufficient time to allow proper testing. Despite these efforts, it was not until March 8, 2000 that ADS provided verbal confirmation that the existing billing system could not be made TIB compliant by April 1, 2000. Despite the Petitioner's reasonable, good-faith efforts, the delays in providing the necessary billing system changes and, in turn, the inability to conduct the proper testing were beyond Petitioner's control.

Based on Petitioner's assessment of its current billing capabilities, Petitioner requests the following waivers for the time periods noted.

<u>TIB Rule Requirement</u>	<u>Rule Provision(s)</u>	<u>Requested Extension</u>
TIB New Service Provider Requirement	47.C.F.R. §64.2401(a)(2)	July 1, 2000
TIB Deniable/Nondeniable Requirement	47.C.F.R. §64.2401(c)	July 1, 2000

Until the requested waiver expires, the Petitioner will provide the appropriate bill message and/or insert and the customer service responses identified in the Petition.

DECLARATION OF H. KEITH OLIVER

I, H. Keith Oliver, Vice President - Accounting and Finance, of Home Telephone Company, Inc. ("Petitioner"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein and on this attachment regarding Petitioner is true and accurate to the best of my knowledge, information, and belief.

Date 3/23/00

H. Keith Oliver
H. Keith Oliver
Vice President - Accounting and Finance

**Home Telephone Company, Inc.
Summary of Contacts with ADS
Concerning Truth-in-Billing Requirement**

- **Mid 1999 – Initial telephone contact concerning ADS's ability to handle TIB requirements.**

Response: Some rules up in the air, evaluating systems to see what program changes needed.

- **8/26/99 – E-mail follow up asking if ADS was working toward meeting TIB rules.**

Response: 8/27/99 E-mail – Yes, but only on CBG system at this time, might need to move to new format.

- **9/9/99 E-mail request to start dialog on how we would convert from SBS to CBG program. Asked for record format necessary for conversion. Conversion being considered for internal purposes, not considered necessary to meet TIB requirements.**

Response: E-Mail 9/9/99 – ADS asked for a few days to respond.

Work progress on conversion for TIB Service Provider Name and Inquiry Contact Requirement, also general Y2K conversions underway.

- **11/1/99 – Intralata Intrastate equal access implemented. Billing system changes required to provide IntraLATA equal access billing.**

Mid-November to late December – Conversion process started to implement in-house rating of IntraLATA toll and local calling plans, as well as, Interlata toll rating for 3rd parties other than AT&T. Required prior to conversion to CBG billing system conversion. Still waiting on details from ADS as to conversion procedure.

- **2/2/00 – Met with Steve Moore, VP and Assistant General Manager, ADS to discuss conversion to CBG. Still no definite word that SBS system could not be made TIB compliant. Decided that conversion process should be started regardless as new system allows for 8" x 11" bill format. Formed internal committee to coordinate conversion. Again requested record layout from ADS to allow for internal changes necessary to begin conversion.**
- **2/17/00 – E-mailed to ADS asking if we needed to file waiver for TIB requirements. Phone response by ADS still reviewing system, requested a few days to respond.**
- **3/2/00 – E-mail to ADS again requesting record layout.**
- **3/8/00 – ADS confirms, by phone, that TIB service Provider Name and Inquiry Contact Requirement will be ready for April 2000 billing cycle. Also first verbal confirmation that SBS system could not be made TIB compliant. Must convert to CBG format. Again, requested record layout for conversion. ADS commits to July conversion timetable for CBG conversion.**

To date, we still have not received formal written notice that SBS billing system cannot be made TIB compliant, nor have we received record layouts necessary to begin conversion process.

- **3/22/00 – Format written, request mailed certified mail to ADS requiring record layout and requesting written confirmation of conversion date for July 2000 to CBG system**

Patrick L Archibald

From: Patrick L Archibald [Patrick.Archibald@HomeTelco.Com]
Sent: Thursday, August 26, 1999 3:47 PM
To: John Setzer
Subject: Truth-in-billing rules

John

Is ADS working toward meeting the FCC's
Truth-In-Billing rules?

Thanx, Patrick

/

/ Patrick L Archibald
/ Home Telephone Company
/ Moncks Corner SC USA
/ <http://www.HomeTelco.Com/pla/>
/ 1-843-761-9190
/

Patrick L Archibald

From: Patrick L Archibald [Patrick.Archibald@HomeTelco.Com]
Sent: Friday, August 27, 1999 7:46 AM
To: John Setzer
Subject: RE: Truth-in-billing rules

OK. Anytime. PLA

-----Original Message-----

From: John Setzer [mailto:John.Setzer@ASSOCDATA.COM]
Sent: Friday, August 27, 1999 7:44 AM
To: Patrick L Archibald
Subject: Re: Truth-in-billing rules

Yes, but on our CBG system only at this time. We will want to discuss moving you to our new format. I'll give you a call to discuss.....jrs

> John Is ADS working toward meeting the FCC's Thanx, Patrick /
>/ P L Archibald
>/ Home Telephone Company
>/ Moncks Corner SC USA
>/ <http://www.HomeTelco.Com/pla/>
>/ 1-843-761-9190
>/

HOME TEL COMM OFF. ID:8037619120 MAR 23'00 11:20 No.007 P.04

11:20 No.007 P.03

MAR 23'00

ID:8037619120

HOME TEL COMM OFF.

Patrick L Archibald

From: John Setzer [John.Setzer@ASSOCDATA.COM]
Sent: Thursday, September 09, 1999 2:59 PM
To: Patrick L Archibald
Subject: Re: Converting from SBS to CBG

Pat, received your email - give me a few days to respond, thanks.....jrs

At 02:43 PM 9/9/99 -0400, you wrote:

>John
>
>I want to start a dialog on how Home Telephone
>Company will convert from the SBS billing system
>to the CBG system.
>
>I think we want to continue to feed you the
>database files necessary to create, print,
>insert, and mail our telephone subscriber's bills.
>
>Can you send me the record formats of the files ADS
>will need to create bills in the CBG system?
>I will then be able to assess the work
>required and then we can schedule a cutover date.
>
>Thanx, Patrick
>
>/
>/ Patrick L Archibald
>/ Home Telephone Company
>/ Moncks Corner SC USA
>/ <http://www.HomeTelco.Com/pla/>
>/ 1-843-761-9190
>/
>

Patrick L Archibald

From: Patrick L Archibald
Sent: Monday, January 31, 2000 1:00 PM
To: Julie.Forte@hometelco.com
Subject: RE: ADS 8.5X11 Subscriber Bill Format

Thanks. C ya then. PLA

-----Original Message-----

From: Julie Forte [mailto:Julie.Forte@hometelco.com]
Sent: Monday, January 31, 2000 12:29 PM
To: 'Patrick L Archibald'
Subject: RE: ADS 8.5X11 Subscriber Bill Format

Count me in, thanks Julie

-----Original Message-----

From: Patrick L Archibald [mailto:Patrick.Archibald@HomeTelco.Com]
Sent: Monday, January 31, 2000 11:32 AM
To: Claude Sykes; Julie Forte; Keith Oliver; Denny V Thompson; Will Helmsly
Subject: ADS 8.5X11 Subscriber Bill Format

Hi COS, JHF, HKO, DVT, WSH

Steve Moore of ADS will be here Wednesday February 2, 2000 at 11:00 AM to discuss the ADS 8.5X11" subscriber bill format. If you want to attend this meeting please reply to this email. I know this is short notice and I don't have many details. ADS called and wanted to meet. We need to go to this larger bill format to meet all of the FCC Truth In Billing requirements so I accepted the offer.

Thanx, Patrick

/

/ Patrick L Archibald
/ Home Telephone Company
/ Moncks Corner SC USA
/ <http://www.HomeTelco.Com/pla/>
/ 1-843-761-9190
/

Patrick L Archibald

From: Patrick L Archibald [Patrick.Archibald@HomeTelco.Com]
Sent: Thursday, February 17, 2000 1:42 PM
To: John Setzer
Subject: April 1, 2000 TIB compliance

John

Should Home Telephone Company file for a waiver
the April 1, 2000 FCC Truth In Billing requirements
listed below or any other requirements that won't be
met by the deadline?

1. "new service providers"
2. "deniable charges"

Thanx, Patrick

/

/ Patrick L Archibald
/ Home Telephone Company
/ Moncks Corner SC USA
/ <http://www.HomeTelco.Com/pla/>
/ 1-843-761-9190
/

Patrick L Archibald

From: Patrick L Archibald [Patrick.Archibald@HomeTelco.Com]
Sent: Thursday, March 02, 2000 3:32 PM
To: John Setzer
Subject: 8.5 X 11 record formats

John

When will I see the record formats for the 8.5 X 11 bill format?

Thanx, Patrick

/

/ Patrick L Archibald
/ Home Telephone Company
/ Moncks Corner SC USA
/ <http://www.HomeTelco.Com/pla/>
/ 1-843-761-9190
/

Home Telephone Company

March 22, 2000

John Setzer
Associated Data Services

Home Telephone Company has expressed, many times, a desire to convert to the CBG system or 8.5" by 11" subscriber bill format. As Of March 22, 2000, we have not received the specifications on the CBG system, which would logically be the first step in converting.

Home Telephone Company has filed a waiver with the Federal Communications Commission concerning Truth In Billing requirements. In this waiver, we state that we will comply with all of the Truth In Billing requirements by July 1, 2000. In order to meet the FCC requirements we must be on the CBG system. We must have your written assurance that the CBG system is compliant with the FCC TIB ruling and that the conversion to this system be completed by July 1, 2000. We must start the necessary steps to accomplish this no later than April 3, 2000.

Please dedicate the resources at Associated Data Services necessary to complete this task. I am the contact on this conversion and will dedicate all the necessary resources at Home Telephone Company.

Sincerely,



Patrick L Archibald
MIS Manager
Home Telephone Company
P O Box 1194
Moncks Corner SC 29461

Cc: Robert L Helmly, President

Keith Oliver, VP Finance

PINE BELT TELEPHONE COMPANY, INC.

Pine Belt Telephone Company, Inc. ("Petitioner") provides exchange and exchange access services to approximately 2,400 access lines in Alabama. The Petitioner is a member of the United States Telecom Association and is a rural telephone company under the Communications Act of 1934, as amended. The Petitioner provides billing and collection services for third party providers including such services for certain interexchange carriers' 1+ traffic and for providers of casual calling and alternate operator services. The Petitioner utilizes National Independent Billing ("NIB") for the provision of end user billing software. Petitioner has made frequent periodic contacts with its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements and has made reasonable and good-faith efforts to ensure that NIB would be taking all necessary steps to ensure that the software upgrades and modifications to its end user billing system would be made in sufficient time to allow proper testing. Despite these efforts, it was not until March 17, 2000 that NIB indicated that it would not be able to meet the April 1, 2000 date, and provided the necessary information that enabled Petitioner to assess what TIB compliance issues remained. Despite the Petitioner's reasonable, good-faith efforts, the delays in providing the necessary software upgrades and, in turn, the inability to conduct the proper testing were beyond Petitioner's control.

Based on the information that NIB has provided to date, Petitioner requests the following waivers for the time periods noted.

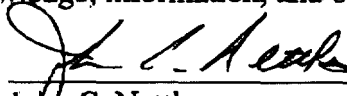
<u>TIB Rule Requirement</u>	<u>Rule Provision(s)</u>	<u>Requested Extension</u>
TIB New Service Provider Requirement	47 C.F.R. §64.2401(a)(2)	June 1, 2000
TIB Deniable/Nondeniable Requirement	47 C.F.R. §64.2401(c)	May 1, 2000
TIB Service Provider Name and Inquiry Contact Requirement	47 C.F.R. §64.2401(a)(1)-(2) and 47 C.F.R. §64.2401(d)	November 1, 2000

Until the requested waiver expires, the Petitioner will provide the appropriate bill message and/or insert and the customer service responses identified in the Petition.

DECLARATION OF JOHN C. NETTLES

I, John C. Nettles, President of Pine Belt Telephone Company, Inc. ("Pine Belt"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein and on this attachment regarding Petitioner is true and accurate to the best of my knowledge, information, and belief.

Date 3/23/00



John C. Nettles
President

PINE BELT TELEPHONE COMPANY, INC.
CHRONOLOGY OF CONTACT WITH BILLING VENDOR

- Weekly managers meetings during which TIB was addressed - and periodic calls to NIBI beginning first week in January, 2000, seeking review and analysis of NIBI system capabilities for TIB compliance.
- January 26, 2000 - memorandum from NIBI stating its opinion that the FCC requirements are general and could not be interpreted and that NIBI had placed a hold on assessing any changes to its billing systems related to TIB until the FCC released a compliance manual.
- Early February - contacted NIBI regarding TIB compliance.
- March 8, 2000 - called NIBI - NIBI reiterated that they were waiting on an FCC manual.
- March 8, 2000 - memorandum from NIBI stating that it was not guaranteeing compliance with Truth-in-Billing regulations, and that it was updating the billing system to process the 020-A module (New Service Provider) and that the module would be implemented on June 1, 2000.
- March 8, 2000 - received memorandum from NIBI outlining the FCC's requirements and advising company of specific system changes necessary to comply with TIB.
- March 16, 2000 - called NIBI regarding status of TIB compliance - was informed of NIBI conference call scheduled for March 17, 2000.
- March 17, 2000 conference call with NIBI - NIBI verified verbally it was unable to meet April 1 deadline for TIB compliance.

TECHLINES



NATIONAL INDEPENDENT
BILLING INCORPORATED

A Subsidiary of Hickory Tech Corporation

215 E. Hickory Street • P.O. Box 772 • Mankato, MN 56002-0772

Tel.: 507/625-1691 • Fax: 507/625-1057

www.nibinc.com

TECHLINES is a technical update for National Independent Billing Incorporated.

January 26, 2000

TRUTH IN BILLING REQUIREMENTS

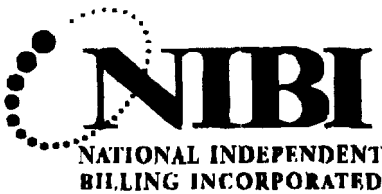
This Techline addresses the Federal Communications Commission (FCC) Guidelines for the Truth In Billing Order scheduled to be implemented April 1, 2000.

After researching the general requirements from the FCC regarding the rules changes, NIBI is of the opinion that it is not possible to fully interpret the FCC requirements because of their general specifications. The FCC has not yet created a compliance manual, which will provide the specific requirements for Truth in Billing. Until we receive that manual, NIBI has placed a hold on assessing any changes to NIBI EasyTel 2000 and Toll Billing systems related to the Truth in Billing requirements.

NIBI will not be responding to the NECA Truth in Billing Cost estimate (Dated October 27, 1999) or the Illuminet TCH B&C Truth in Billing survey (Dated November 15, 1999) until the FCC compliance manual is released.

If you have any questions, please contact:

Ken Klingsporn
NATIONAL INDEPENDENT BILLING, INC.
Business Support Manager
(507) 388-0230
kenk@nibinc.com



A Subsidiary of Hickory Tech Corporation

215 East Hickory Street P.O. Box 772 Mankato, MN 56002-0772

March 8, 2000

Mr. John Nettles
Pine Belt Telephone Co.
3984 County Road 32
P.O. Box 279
Arlington, AL 36722-0278

Ph: 507.625.1691

Fax: 507.625.1057

www.nibinc.com

Dear John:

The FCC adopted the Truth in Billing Order that will be applicable to all telecommunications wireline carriers. FCC has mandated Truth in Billing to be implemented on April 1, 2000 by all NIBI customers. NIBI acknowledges Truth in Billing and is taking action to help its NIBI customers move toward compliance with the Truth in Billing Regulations. In order to help all NIBI customers move toward becoming compliant, NIBI will provide the option to add enhancements to all current systems.

An assessment, NECA Time and Cost Estimate form, and Illuminet surveys are being provided to all NIBI customers. The assessment provides information on the enhancements to NIBI systems as part of the Truth in Billing requirements. The NECA Time and Cost Estimate and Illuminet surveys will provide the information that NIBI customers may be required to submit. The amount provided for NECA's Time and Cost Estimate reflects only the amount it will take NIBI to enhance systems as part of Truth in Billing requirements. If needed, your additional costs may be added to NECA's Time and Cost Estimate.

Currently, NIBI is updating the Telco Billing and Rating systems to be able to process the 020-A module (used for notification on any Service Provider change). NIBI has set the implementation date for 020-A module use to June 1, 2000.

If any NIBI customers will not be compliant as of April 1, 2000 as mandated by the FCC, a bill insert will need to be provided in all customer bills stating the Truth in Billing Regulations, that the bills are not yet compliant and the reason(s) for not being compliant. For EasyTel, and EasyTel2000, a 34-line user-defined statement message is available for creating the billing insert. If the statement message is used and it creates an additional page, the NIBI charge for printing the additional page is \$.05. If any NIBI customer wishes to use a pre-printed billing insert for customer notification, the cost will be \$.05 per insert plus the cost of producing the billing insert.

NIBI is not guaranteeing compliance with Truth in Billing Regulations, but is striving to help its customers move towards becoming compliant. If any NIBI customer needs to submit a waiver to the FCC for the April 1, 2000 requirements, it will be their responsibility to contact the FCC for waiver submission information.

As a way of helping NIBI customers understand Truth in Billing, NIBI will be setting up conference calls to help answer any questions. We will be sending you a notification of the conference time by next week.

If you have any questions regarding this information, please contact NIBI Customer Support at (507) 388-0250.

Sincerely,

NATIONAL INDEPENDENT BILLING, INC.

Vicki Sutherland
Business Support Supervisor



**NATIONAL INDEPENDENT
BILLING INCORPORATED**

A Subsidiary of Hickory Tech Corporation

PROJECT ASSESSMENT

TO: John Nettles, Pine Belt Telephone Co.

FROM: National Independent Billing, Incorporated (NIBI)

SUBJECT: Truth in Billing Requirements

DATE: March 8, 2000

OVERVIEW: Adriana Maldonado, NIBI Business Analyst

HOURS/DOLLARS: Marlys Mackey, Project Administrator

OVERVIEW:

Changes will need to be made to the NIBI EasyTel, Toll Rating and Billing systems as a result of the Truth in Billing Regulations, currently being implemented on April 1, 2000. NIBI is not guaranteeing compliance with Truth in Billing Regulations through this document. This assessment will focus on the requirements of Truth in Billing, system changes needed to meet the requirements, and the options that are available for these requirements as methods that may be used to move toward compliance of the Truth in Billing Regulations.

Following are the five main requirements identified by NIBI:

1. Clear identification of the name of the Service Provider associated with each charge on the customer's bill.
2. A brief, clear, plain language description of the services included on the customer's bill.
3. Prominent display on the bill of a toll-free number (or numbers) by which customers may inquire or dispute any charge on the bill.
4. Clear and conspicuous notification of any change in Service Providers (Service Providers that did not bill for services on the previous billing statement) including, where appropriate, any new presubscribed or continuing relationship with the customer.
5. A differentiation between deniable and non-deniable charges.

The Project Assessment and scheduled release date are based upon the following statements:

SYSTEM CHANGES:

System changes will be needed for EasyTel, Toll Rating and Toll Billing systems.

*Easytel***Requirement #1 – Identify Service Provider with each charge**

- Identifying the Service Provider with each charge can be handled through setup. No coding changes will be needed.

Requirement # 2 – Clear description of services

- Clear description of service can be handled through setup. No coding changes will be needed.

Requirement # 3 – Display toll-free number

- Identifying the toll-free number with each charge can be handled through setup. No coding changes will be needed.

Requirement # 4 – Notification of Service Provider Change

- Existing functionality may be used to notify the new service provider. No coding changes will be needed for to notify a service provider change.

Requirement # 5 – Differentiation between deniable and non-deniable charges

- Identifying the deniable and non-deniable charges can be handled through setup. No coding changes will be needed.

*Telco Rating***Requirement #1 – Identify Service Provider with each charge**

- System changes will be needed to provide the ability to process 002-B module for identifying Service Provider information on CDR's.

Requirement # 2 – Clear description of services

- This requirement is not applicable for telco rating.

Requirement # 3 – Display toll-free number

- This requirement is not applicable for telco rating.

Requirement # 4 – Notification of Service Provider Change

- System changes will be needed to process the 020-A module and pass the new service provider indicator to telco billing.

Requirement # 5 – Differentiation between deniable and non-deniable charges

- This requirement is not applicable for telco rating.

*Telco Billing***Requirement #1 – Identify Service Provider with each charge**

- System changes will be needed to process 9 digit cic (4 = cic, 5 = subcic) values. System changes will be needed to interrogate the subcic information to be presented on the bill.

Requirement # 2 – Clear description of services

- This requirement is not applicable for telco billing.

Requirement # 3 – Display toll-free number

- Displaying the toll-free number can be handled through setup. No coding changes will be needed.

Requirement # 4 – Notification of Service Provider Change

- System changes will be needed to process and check the new service provider indicator and present who the new provider is and place the message on the toll detail page.

Requirement # 5 – Differentiation between deniable and non-deniable charges

- Currently, telco billing displays a message pertaining to deniable charges for customers that have 900 messages.

RECOMMENDATIONS:

Currently, there are options available in the system to move toward the Truth in Billing requirements. No code changes are necessary for these options, only set up changes.

Requirement # 1 – Identify Service Provider with each charge

- The Vendor Code description can be used to identify the service provider on the local service bill. If the Vendor Code description is used, the Vendor Code switch will need to be set to 'Y' for "Itemize" and respond with 'Y' to "Itemize All Subscribers" when creating laser statements to get a fully itemized bill.

Requirement # 2 – Clear description of services

- Item charge codes may also be used to identify the description of services.
- Itemization can be set up on an individual basis or for all residential or business customers within a cycle.

Requirement # 3 – Display toll-free number

- Statement messages may be used to identify a toll-free number.
- For telco billing, the phone number that is printed on each toll detail statement can be used as the toll-free number.

Requirement # 4 – Notification of Service Provider Change

- Code change will be needed to notify a service provider change.

Requirement # 5 – Differentiation between deniable and non-deniable charges

- Statement messages may be used to identify the deniable and non-deniable charges. Currently, there is a 34-line customer message available in addition to the two-line statement message.
- In conjunction with the statement messages, an '*' can be placed in front of the description for either deniable or non-deniable charges. A brief description can be placed in the statement messages explaining the charges with an '*' indicator.
- The Vendor Code description can be used to identify the deniable and non-deniable charges on the local service bill. If the Vendor Code description is used, the Vendor Code switch will need to be set to 'Y' for "Itemize" and respond with 'Y' to "Itemize All Subscribers" when creating laser statements to get a fully itemized bill.

NOTE: If you have any questions regarding this information, please contact NIBI Customer Support at (507) 388-0250.

The Project Assessment reflects an hour/dollar range for completion of the project.

Requirement # 1	\$		to	\$	
Requirement # 2			to		
Requirement # 3			to		
Requirement # 4	\$		to	\$	
Requirement # 5			to		0
Total Dollar Range will be	\$		to	\$	

This assessment is valid for 45 days from signature date. In the event that the design phase indicates the project cannot be completed in the estimated time, a new Project Assessment will be prepared. The customer then has an option to approve the new Project Assessment or pay for hours incurred for the design phase.

NIBI will provide documentation of all Project Assessment hours through normal job accounting reporting, and NIBI will retain all proprietary rights to software modifications made at the request of the customer, including the right to copy and distribute the software.

Your signature below authorizes NIBI to proceed with this project.

Customer Signature
Pine Belt Telephone Co.

Date

NIBI Signature

Date

Ray Adams/mm 3-8-00

BILLING INSERT SAMPLE USING STATEMENT MESSAGES**TRUTH-IN-BILLING REGULATIONS**

New FCC regulations have taken effect which require telephone companies to reformat their customer bills in order to provide:


- Clear identification of the name of the Service Provider associated with each charge.
- A brief, clear, plain language description of the services included on the customer's bill.
- Prominent display on the bill of a toll-free number (or numbers) by which customers may inquire or dispute any charge on the bill.
- Clear and conspicuous notification of any change in Service Providers (Service Providers that did not bill for services on the previous billing statement).
- A differentiation between deniable and non-deniable charges.

HOW WE ARE COMPLYING:

- We continue to try to provide a bill that is as clear and understandable as possible. We are completing computer and systems work necessary to make the changes to reflect the FCC Truth-In-Billing regulations.
- We have not yet changed your bill to list the name and contact number of dial-around or alternative operator service providers. In such instances, if these charges appear on our bill, we will respond to your inquiries at the following toll-free number.

CERTIFICATE OF SERVICE

I, Shelley Davis, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC, 20037, hereby certify that a copy of the foregoing "Supplement to March 21, 2000 Petition for Temporary, Limited Waiver" was served on this 23rd day of March, 2000, by hand delivery to the following parties:


Shelley Davis

Lawrence Strickling, Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-C450
Washington, DC 20554

Carol Matthey, Deputy Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW, Room 5B125
Washington, DC 20554

Glenn T. Reynolds, Division Chief
Market Disputes Resolution Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-A847
Washington, DC 20554

Katherine Schroder, Deputy Chief
Accounting Policy Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-C453
Washington, DC 20554

Deena Shetler, Legal Counsel
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-C410
Washington, DC 20554

International Transcription Services
1231 20th Street, NW
Washington, DC 20554